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CRIMINAL LAW & PROCEDURE, HABEAS CORPUS

Sanchez v. Roden, No. 13-1394

The petition for a writ of habeas corpus challenging petitioner's conviction of second degree murder and unlawful possession of a firearm, is granted and the matter is remanded, where: 1) the Massachusetts Appeals Court (MAC) unreasonably applied Batson's first prong in that it wholly failed to consider all of the circumstances bearing on potential racial discrimination in the prosecution's use of its peremptory challenges on African-American men; 2) the MAC's treatment of defendant's Batson claim was objectively unreasonable in light of clearly established federal law; 3) defendant satisfied his initial burden under Batson, and the prosecutor should have been required to articulate a race-neutral reason for his peremptory strike; and 4) the appropriate remedy is for the district court to hold an evidentiary hearing to complete the Batson inquiry.